

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

ASHLEY T. JONES, 216506
PLANTIFF,

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VS.

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CIVIL ACTION: 2:05 CV 731-F

WARDEN GLADYS DEESE (Individually
And Official Capacity), **DEPUTY WARDEN**
FRANK ALBRIGHT (Individually
And Official Capacity)
DEFENDANT(S)

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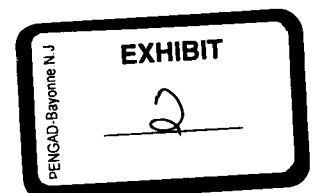
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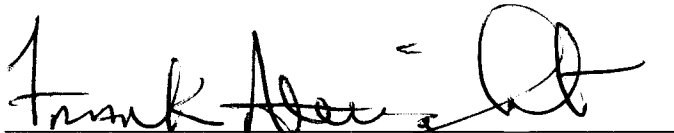
Before me the undersigned a Notary Public, this day personally appeared Frank Albright, who being duly sworn deposes and makes the following statement.

My name is Frank Albright. I am an individual over the age of nineteen years and am employed by the State of Alabama, Department of Corrections, at Julia Tutwiler Prison for Women, 8966 U. S. Highway 231, in Wetumpka, Alabama. I am employed in this capacity as Warden II. I have read the complaint in the above referenced case and make the following statement.

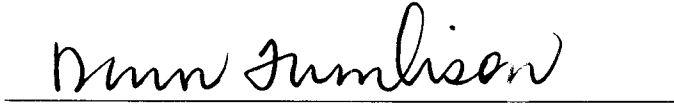
I deny any claim that I have threatened, harassed or knowingly violated any of inmate Ashley T. Jones', B/F 216506, constitutional rights. The fact of the matter is that inmate Jones was removed from her assigned job as GED tutor due to security reasons, not her length of time on the job. I had information that led me to believe that inmate Jones was not performing her job as to protocol. Inmate Jones was re-assigned to a job that provided more structured supervision.

Inmate Jones was not carried before job board on June 14, 2005, because I knew that ultimately the Warden is responsible for all decisions made by the job board committee. I did not want to discuss the confidential information presented at job board, an open forum, with the inmate present. Again, I deny any claim that I have threatened, harassed or knowingly violated any of inmate Jones' constitutional rights.




Affiant

Sworn and subscribed before me this 20 day of September, 2005.


Notary Public

My commission expires 06/21/2009.